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**From:** Pavitt, John [Pavitt.John@epa.gov]  
**Sent:** 10/28/2019 5:54:18 PM  
**To:** Williams, Christopher [Williams.Christopher@epa.gov]  
**CC:** McClintock, Katie [McClintock.Katie@epa.gov]  
**Subject:** FW: Subpart OOOOa Notices of Well Workover

Chris, you asked if it's possible Hilcorp had submitted their well workover notices to the State. ADEC checked this morning and found none.

Sincerely,

John Pavitt, Air Compliance Inspector  
Air and Toxics Enforcement Section  
U.S. EPA Region 10  
Alaska Operations Office  
Anchorage, AK  
Phone: (907) 271-3688

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**From:** Olds, Jason R (DEC) <jason.olds@alaska.gov>  
**Sent:** Monday, October 28, 2019 9:14 AM  
**To:** Pavitt, John <Pavitt.John@epa.gov>  
**Cc:** Mallinger, Hunter L (DEC) <hunter.mallinger@alaska.gov>; Howard, Breanna K (DEC) <breanna.howard@alaska.gov>  
**Subject:** RE: Subpart OOOOa Notices of Well Workover

Hi John,

I looked through their annual reports for OOOOa and Milne Point for the reference discussed under 60.5420a(2) and found no mention. Additionally, I checked to see if their relocation notices were specific enough to correlate with well completion work in case they included language to satisfy the requirement and confirmed that their wasn't even a correlation with location.

I think ADEC is out of gas on this one.

Jason

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**From:** Pavitt, John <Pavitt.John@epa.gov>  
**Sent:** Monday, October 28, 2019 8:43 AM  
**To:** Olds, Jason R (DEC) <jason.olds@alaska.gov>  
**Cc:** Mallinger, Hunter L (DEC) <hunter.mallinger@alaska.gov>; Howard, Breanna K (DEC) <breanna.howard@alaska.gov>  
**Subject:** Subpart OOOOa Notices of Well Workover

Is it possible that Hilcorp has been submitting Advance Notices of Well Workovers to ADEC? In my draft inspection report, one of my findings is that EPA did not receive any of these notices from Hilcorp. They're required at least 2 days in advance, when working over old wells that then become subject to subpart OOOOa.

We don't have them in CEDRI or in our files. Does ADEC?

Thanks,

John Pavitt, Air Compliance Inspector  
Air and Toxics Enforcement Section  
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